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Land & Water Fund

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ARIZONA CORPORATION COMMISSION

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May 13, 1999

Ray Williamson
Acting Director, Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona

Arizona Corporation Commission

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Re. Docket No. RE-00000C-94-165

Dear Ray:

In response to the Procedural Order of the Chief Hearing Officer dated May 7, 1999, the Land and Water Fund (LAW Fund) hereby requests the Staff to establish workshops for the following issues¹:

- ◆ Information disclosure: a workshop to seek consensus on the method(s) to employ to determine and report the composition, fuel mix and emission characteristics of the generation resource portfolio. [Reference Summary page 4, lines 17 through 21, and page 12, lines 3 through 5]
- ◆ Aggregation: a workshop to seek consensus on the necessity for any limitations on aggregation of customer loads during Phase 1. [Reference Summary page 4, lines 22 through 23]
- ◆ System Benefits Charges (SBC): a workshop to reach consensus on the specific utility programs whose costs are to be recovered through the SBC. In addition, the workshop(s) can establish the procedures and policies for proposing changes to the SBC funded programs and SBC funding levels. [Reference Summary page 4, lines 23 through 25, and page 5, lines 3 through 7]
- ◆ New distribution fees: a workshop to determine appropriate policies and/or fees for connection of distributed generation, especially renewables, to the grid. Reference Summary page 5, lines 22 through 25

Thanks you for the opportunity to propose these workshops as a consensual approach to resolving these important issues. We look forward to working with you over the next several months.

Sincerely,

/s/ Rick Gilliam
Senior Technical Advisor
LAW Fund Energy Project

¹ Reference Attorney General's and RUCO's Amended filing of Summary of remaining issues in electric industry restructuring, dated May 4, 1999. Identified in the text as "Summary."